

Exhibit “A”

LAW OFFICES OF KARIM ARZADI

Karim Arzadi, Esq. - Attorney ID No: 012581987
Ernest Blair, Esq. - Attorney ID No: 036071983
163 Market Street
Perth Amboy, New Jersey 08861
(732) 442-5900
Attorney for Plaintiffs

RODERICK MITCHELL,

Plaintiffs,

vs.

B & JR SERVICE LLC, PHANTOM
VEHICLE OPERATOR 1-10
(fictitious names), JOHN DOES
1-10 (fictitious names), RICHARD
ROES 1-10 (fictitious names) and
ABC COMPANIES, INC. 1-10
(fictitious names),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
ESSEX COUNTY

Docket No.: ESX-L-

CIVIL ACTION

**COMPLAINT, JURY DEMAND
AND CERTIFICATION**

The Plaintiff, Roderick Mitchell, residing at 283 Stegman
Parkway, Apartment 105, in the City of Jersey City, County of Hudson,
State of New Jersey, by way of Complaint against the Defendants, say:

FIRST COUNT

1. On or about May 27, 2020, the Plaintiff, Roderick Mitchell,
was operating a forklift loading a truck at a loading dock at 287
Miller Street, in the City of Newark, County of Essex, and State of
New Jersey.

2. At the time and place aforesaid, the Defendant, B & JR
Service LLC, was the owner and John Doe, an agent servant and/or
employee of Defendant, B & JR Service, LLC, was the operator of the
truck which Plaintiff was loading at the aforesaid location.

3. At the time and place aforesaid, the Defendant(s), John Does 1-10 and/or ABC Companies, Inc. 1-10 (fictitious names), was/were the owner(s) of a certain motor vehicle(s) which was/were being operated by his/her/its agent(s), servant(s) and/or employees, the Defendant(s), Richard Roes 1-10 (fictitious names), along the aforesaid roadway.

4. The aforesaid Defendant(s), John Does 1-10, Richard Roes 1-10 and/or ABC Companies, Inc. 1-10, are fictitious names intended to identify any and all parties including individuals, corporations and/or other entities whose identities are presently unknown to the Plaintiff who together with the named Defendants, were the owners and/or operators of vehicles upon the aforesaid roadways and whose negligence contributed to Plaintiff's injuries.

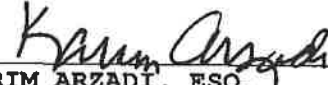
5. At the time and place aforesaid, the Defendants, or either of them, so negligently operated and/or maintained and/or controlled their motor vehicles as to cause same to injure Plaintiff.

6. As a direct and proximate result of the aforesaid negligence of the Defendants, or either of them, the Plaintiff, Roderick Mitchell, sustained serious and permanent physical injuries, suffered, still suffers and will continue to suffer from great physical pain and mental anguish, was confined, is and will continue to be so confined, was obliged, still is, and will in the future be obligated to expend large sums of money for medical and other needed care of the aforesaid injuries, was prevented, is, and will in the future be prevented from pursuing his usual course of conduct and employment and in the future will be caused great pain and suffering, to his great loss and damage.

WHEREFORE, the Plaintiff, Roderick Mitchell, demands judgment against the Defendants, B & JR Service, LLC, phantom vehicle operator 1-10 (fictitious names) John Does 1-10 (fictitious names), Richard Roes 1-10 (fictitious names) and ABC Companies, Inc. 1-10 (fictitious names), either jointly, severally or in the alternative, for damages, together with interest and costs of this suit and/or such other relief as this Court may deem fair and proper.

LAW OFFICES OF KARIM ARZADI

Dated: March 29, 2021



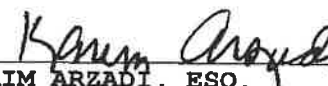
KARIM ARZADI, ESQ.
Attorneys for Plaintiff

DESIGNATION OF TRIAL COUNSEL

Ernest Blair, Esq. is hereby designated as trial counsel in the above matter.

LAW OFFICES OF KARIM ARZADI

Dated: March 29, 2021



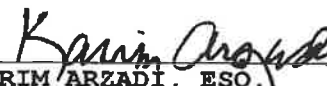
KARIM ARZADI, ESQ.
Attorneys for Plaintiff

DEMAND FOR TRIAL BY JURY

The Plaintiff demands a trial by jury as to all issues herein.

LAW OFFICES OF KARIM ARZADI

Dated: March 29, 2021



KARIM ARZADI, ESQ.
Attorneys for Plaintiff

CERTIFICATION

The undersigned hereby certifies that the matter in controversy is not now the subject of any other pending action in any court and is likewise not the subject of any pending arbitration proceeding. The Plaintiff is not aware of any other parties or the true identities of other parties who should be joined in this action at this time. The complaint will be amended when true identities of the fictitious Defendants become known to the Plaintiff.

Dated: March 29, 2021

LAW OFFICES OF KARIM ARZADI


KARIM ARZADI, ESQ.
Attorneys for Plaintiff

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-002553-21

Case Caption: MITCHELL RODERICK VS B & JR
SERVICE LLC

Case Initiation Date: 03/30/2021

Attorney Name: KARIM K ARZADI

Firm Name: KARIM ARZADI

Address: 163 MARKET ST
PERTH AMBOY NJ 08861

Phone: 7324425900

Name of Party: PLAINTIFF : MITCHELL, RODERICK

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: RODERICK MITCHELL? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

03/30/2021

Dated

/s/ KARIM K ARZADI

Signed